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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 AIRLINES REPORTING CORPORATION,

11 Plaintiff/Judgment Creditor,

12 v.

13 COMMERCIAL TRAVEL
CORPORATION d/b/a MATLOCK
TRAVEL, *et al.*,

14 Defendants/Judgment Debtors.

CASE NO. 08-MC-00088

OBJECTIONS OF DEFENDANT MARIO
REND A TO DECLARATIONS OF
SUZANNE LEWIS AND BRYAN
SAMPSON AND EXHIBITS LODGED BY
AIRLINES REPORTING CORPORATION
IN SUPPORT OF MOTION FOR AN
ASSIGNMENT ORDER

Date: July 25, 2008
Time: 10:00 a.m.
Crm: 1, 4th Floor
Judge: Hon. Irma E. Gonzalez

Judgment: September 4, 2007

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19 Defendant MARIO RENDA submits the following objections to the April 14, 2008,
20 Declaration of Suzanne Lewis, Esq. and the April 8, 2008, Declaration of Bryan D. Sampson,
21 Esq. submitted in support of Plaintiff AIRLINES REPORTING CORPORATION's motion for
22 an assignment order.

23 **April 14, 2008, Declaration of Suzanne Lewis**

24 Page 2, paragraph 3, lines 6-9

25 Objections: Lacks foundation, inadmissible legal conclusion with respect to
26 Ms. Lewis' opinion regarding jurisdiction, Fed. R. Evid. 403.

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Page 2, paragraph 4, lines 10-13

Objections: Lacks foundation, hearsay, best evidence, Fed. R. Evid. 403.

Ms. Lewis does not have personal knowledge sufficient to provide
admissible testimony to support ARC's allegations against Mr. RENDA.

Page 2, paragraph 5, lines 13-20

Objections: Lacks foundation, hearsay, best evidence, Fed. R. Evid. 403.

Ms. Lewis does not have personal knowledge sufficient to provide
admissible testimony to support ARC's allegations against Mr. RENDA.

Page 2, paragraph 6, lines 21-25

Objections: Irrelevant, lacks foundation, hearsay, best evidence, Fed. R. Evid. 403.

Ms. Lewis does not have personal knowledge sufficient to provide
admissible testimony to support ARC's allegations against Mr. RENDA.

Moreover, on June 26, 2008, the San Diego County Superior Court
determined that ARC's default judgment against Mr. RENDA from the
Circuit Court of Arlington County, Virginia is void for lack of personal
jurisdiction.

Page 3, paragraph 7, lines 1-2

Objections: Irrelevant, hearsay, lacks foundation, best evidence, Fed. R. Evid. 403.

April 8, 2008, Declaration of Bryan D. Sampson

Page 2, paragraph 3, lines 2-3 and Exhibit 1 to ARC's Notice of Lodgment

Objection: Irrelevant, Fed. R. Evid. 403.

Page 2, paragraph 4, lines 4-5 and Exhibit 2 to ARC's Notice of Lodgment

Objection: Irrelevant, Fed. R. Evid. 403.

Page 2, paragraph 5, lines 6-7 and Exhibit 3 to ARC's Notice of Lodgment

Objection: Irrelevant, Fed. R. Evid. 403.

Page 2, paragraph 6, lines 8-9 and Exhibit 4 to ARC's Notice of Lodgment

Objection: Irrelevant, Fed. R. Evid. 403.

1 Page 2, paragraph 9, line 14 and Exhibit 7 to ARC's Notice of Lodgment

2 Objection: Irrelevant, Fed. R. Evid. 403.

3 Page 2, paragraph 12, lines 22-24

4 Objections: Hearsay, lacks foundation, best evidence, inadmissible opinion
5 testimony, Fed. R. Evid. 403. Mr. Sampson does not have personal
6 knowledge sufficient to provide admissible testimony to support ARC's
7 allegations against Mr. RENDA.

8 Page 2, paragraph 13, lines 25-27

9 Objections: Hearsay, lacks foundation, best evidence, inadmissible opinion
10 testimony, Fed. R. Evid. 403. Mr. Sampson does not have personal
11 knowledge sufficient to provide admissible testimony to support ARC's
12 allegations against Mr. RENDA.

13 Page 3, paragraph 15, lines 5-6

14 Objections: Irrelevant, Fed. R. Evid. 403.

15 Page 3, paragraph 16, lines 7-11

16 Objections: Irrelevant, Fed. R. Evid. 403. These requests for production were
17 served in *McCord* in October, 2006. They are completely irrelevant to
18 this motion and this action. ARC did not even have the default judgment
19 in the case at bar until September 4, 2007.

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21 Dated: July 11, 2008

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24 By: s/ JOHN J. FRENI, ESQ.
Attorneys for Defendant, MARIO RENDA